

Claims 1 and 2 have been amended to include the limitations of claims 13 and 14.

Claim 5 has been amended to depend on claims 3 and 4.

It is respectfully submitted that the prior art cited by the Examiner neither anticipates nor renders obvious pending claims 1-12, 15 and 16.

### REMARKS

#### Currently Amended Claim 2 and Claims Depending on Claim 2

In the Non-Final Office Action mailed on October 6, 2004, the Examiner rejected claim 2 as purportedly anticipated by Roberts, writing that the reference discloses “a connector comprising: a housing (1); two flexible circuits (12) having contact areas (13); pusher members (7); fitting aperture (18); insertion openings (36); and a position means (4, 5).” Office Action at page 3.

Applicants note that Roberts’ “pusher members (7)” comprise a pair of springs, each of which are clamped leaving a free portion that forms an arc, the entirety of which arc abuts one surface of the flexible portions of a pair of flexible circuits (12). *See* Roberts, FIG 2., col. 4, lines 15-23. Roberts’ pair of springs are further not connected one to each other to form a unitary part. Their relative alignment is maintained by the unitary structure of the connector and, in any event, they are separated by the intervening flexible portions of a pair of flexible circuits (12). *Id.* col. 4, lines 4-10. As noted by the Examiner, the Roberts’ connector also connects only two flexible circuits (12). *Id.* col. 4, lines 12-15.

In contrast newly amended claim 2 includes the limitations of “a fitting aperture into which *at least three* flexible printed circuit boards are inserted,” “pusher members hav[ing] *substantially a U-shape*,” pusher members that are “*formed of a unitary part*,” and pusher members that comprise “pushing *portions extending towards the flexible printed circuit boards*” (emphasis added). Accordingly, for at least the reasons that Roberts fails to disclose or suggest (1) a fitting aperture into which at least three flexible printed circuit boards are inserted, (2) U-shaped pusher members, (3) pusher members that are formed of a unitary part, or (4) pusher members having pushing portions extending towards the flexible circuit boards, Applicants respectfully submit that currently amended claim 2 cannot be anticipated by Roberts.

Applicant further respectfully submits that, because claims 4 and 15 depend on currently amended claim 2, and so contain all of its limitations, Roberts cannot disclose or suggest the limitation of claims 4 and 15. Furthermore, those parts of claims 5-12 and 16 that depend, through multiply dependent claim 5, on claim 2 contain all of its limitations. Accordingly, the limitations of such portions of claims 5-12 and 16 that depend on claim 2 cannot be anticipated by Roberts.

#### Currently Amended Claim 1 and Claims Depending From Claim 1

In the Non-Final Office Action mailed on October 6, 2004, the Examiner rejected claim 1 as purportedly rendered obvious by “Roberto (US 4,975,468)” writing that “similarly to the rejection of claims 2, 14,15, Roberto discloses substantially disclosed the claimed invention except there is a three flexible circuit.” Office Action at page 3.

As an initial matter, Applicants are unsure which reference(s) the Examiner means by the citation to “Roberto (US 4,975,468)”--U.S. Patent No. 5,350,319, to *Roberts*, or, U.S. Patent No. 4,975,068, to Squires, or both. In any event, Applicant believes that Roberts and Squires, alone or in combination, do not render claim 1 obvious by suggesting the use of three flexible circuits.

As discussed above, Roberts discloses a connector for connecting the flexible portions of a pair of flexible circuits (12) mounted face-to-face between a pair of springs (7). *See Roberts*, FIG. 2, col. 4, lines 4-23. Thus, even if it were assumed that Roberts somehow suggests to one having ordinary skill in the art a connector with more than two flexible circuits, which it does not, Roberts *could not* suggest a connector having an *odd number* of flexible circuits, such as the connector of currently amended claim 1, since Roberts is explicitly limited to connectors having *paired* flexible circuits. Accordingly, Applicant respectfully submits that, notwithstanding the Examiner’s assertion to the contrary, currently amended claim 1 cannot be rendered obvious by Roberts for at least the reason that Roberts actually teaches away from a connector having three, or any odd number, of flexible circuits..

Squires is generally directed to the establishment of a connection a first and second flat cable or tape. *See Squires* FIGS. 1 and 2, col. 2, lines 40-47, claims 1-22. Thus, even if it were assumed that Squires suggests to one having ordinary skill in the art a connector having more than two flexible circuits, which it does not, Squires *could not* suggest a connector for an *odd number* of flexible circuits, such as the connector of claim 1, since Squires is explicitly limited to a connector for *paired* cables. Accordingly, Applicant respectfully submits that, notwithstanding the Examiner’s assertion to the

contrary, currently amended claim 1 cannot be rendered obvious by Squires for at least the reason that Squires actually teaches away from a connector having three, or any odd number, of flexible circuit boards.

In any event, even if Roberts and /or Squires were to somehow suggest to one having ordinary skill in the art a connector having three flexible circuits, which they do not, these references fail to suggest other limitations of currently amended claim 1.

Like currently amended claim 2, currently amended claim 1 includes the limitations of “a fitting aperture into which at least three flexible printed circuit boards are inserted,” “pusher members hav[ing] substantially a U-shape,” pusher members that are “formed of a unitary part,” and pusher members that comprise “pushing portions extending towards the flexible printed circuit boards.” As discussed above, such limitations are neither disclosed nor suggested by Roberts. Similarly, Squires, a patent that is generally directed to a clamp-like connector for connecting a single pair of flat cables, neither discloses nor suggests such limitations of currently amended claim 1. Accordingly, for at least the reasons that neither Roberts nor Squires, taken alone or in combination, disclose or suggest (1) a fitting aperture into which at least three flexible printed circuit boards are inserted, (2) U-shaped pusher members, (3) pusher members that are formed of a unitary part, or (4) pusher members having pushing portions extending towards the flexible circuit boards, Applicants respectfully submit that neither Roberts nor Squires, taken alone or in combination, can render obvious currently amended claim 1.

In light of the above, Applicant further respectfully submits that, because claim 3 depends on claim 1, and so contains all of its limitations, neither Roberts nor

Squires, taken alone or in combination, can render obvious claim 3. Similarly, those portions of claims 5-12 and 16 that depend on claim 1, through multiply dependent claim 5, contain all of its limitations. Accordingly, notwithstanding the Examiner's partial reliance on Regnier for the disclosure of "a circuit (10) having a slit (16)" as a basis for rejecting claims 6-11, Office Action at page 3, those portions of dependent claims 5-12 and 16 that depend claim 1 cannot be rendered obvious by Roberts, Squires and /or Regnier, taken alone or in combination.


CONCLUSION

Applicant respectfully submits that this application is in a condition for allowance and such disposition is earnestly solicited. Applicants believe that no fees are due. In the event that any fees are due, please charge undersigned's Deposit Account No. 02-4377.

Respectfully submitted,

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